

### **REMARKS/ARGUMENTS**

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-5, 8-17 and 20-33 are presently pending in this application. Claims 6, 7, 18, 19 and 34 are canceled without prejudice or disclaimer, and Claims 1, 5, 10-13, 22-24, 27, 28 and 30-32 are amended by the present amendment. Amended Claims 1, 13, 27 and 31 find support at least in the specification at page 10, line 22 to page 11, line 1, and in original Claims 6 and 7, for example. Claims 5, 10-12, 22-24, 28, 30 and 32 are amended for clarification. No new matter is added.

In the outstanding Office Action, the drawings were objected to; Claims 1-6, 8, 10, 13-18, 20, 23, 26, 27, 29 and 31-33 were rejected under 35 U.S.C. § 102(b) as anticipated by Amemiya et al. (U.S. Patent Publication No. 2002/0106212, herein "Amemiya"); Claims 1, 6-8, 10, 13, 18-20, 23, 26, 27, 29 and 31-34 were rejected under 35 U.S.C. § 102(b) as anticipated by Kimura et al. (JP 07-140763, herein "Kimura"); Claims 1, 6, 8, 11-13, 18, 20, 22, 24, 27, 28 and 30-33 were rejected under 35 U.S.C. § 102(b) as anticipated by Tombs (U.S. Patent 5,722,015); Claims 1, 7-9, 12, 13, 19-21 and 25 were rejected under 35 U.S.C. § 102(b) as anticipated by Hiroshima et al. (EP 0 738 938 A1, herein "Hiroshima"); and Claims 11, 12 and 28 were rejected under 35 U.S.C. § 103(a) as unpatentable over Amemiya.

In response to the objection to the drawings under 37 C.F.R. § 1.83(a), Claims 11, 12, 22, 24, 28 and 30 are amended. More specifically, Claims 11 and 22 are amended to recite that an image bearing body contacts a blade member, and the blade member cleans the image bearing body, as shown, for example, in Figure 1. Claims 12 and 24 are amended to delete the objected features noted in the outstanding Action. Claim 28 is amended to recite that the image forming apparatus according to claim 27 further includes means for bearing an image,

as shown, for example, in Figure 1. Claim 30 is amended to recite that the image forming apparatus according to claim 27 further includes means for transferring an image from an image bearing body to a recording medium, as shown, for example, in Figure 1.

Accordingly, it is respectfully submitted that these claims comply with the requirement of 37 C.F.R. § 1.83(a), and requested the objection be withdrawn.

Addressing the above-noted rejections, those rejections are traversed as discussed next.

Independent Claim 1 is amended to clarify features recited therein and to better define over Amemiya, Kimura, Tombs and Hiroshima. Specifically, Claim 1 now recites that a brush member contacts and removes negatively charged toner particles from a member. The brush member includes a conductive material and a fiber material that is positively chargeable when rubbed with the toner particles, and the brush member has a resistance value between  $1 \times 10^3 \Omega$  and  $1 \times 10^8 \Omega$ .

According to the invention of Claim 1, charges generated at a tip of the brush member by rubbing with the toner particles are dispersed to all portions of the brush member, and thus the toner particles are adhered to every part of the brush member from the tip to a base of the brush member. As a result, it becomes possible to efficiently clean the toner particles.

Further, as the brush member includes a conductive material, it is possible to efficiently discharge the toner particles adhered to the brush member, and to minimize a re-adherence of the toner particles to the charged brush member.

Applicant respectfully submits that Amemiya, Kimura, Tombs and Hiroshima do not disclose the above-noted claimed features of amended Claim 1.

Amemiya describes a cleaning device.<sup>1</sup> However, Applicant respectfully submits that Amemiya fails to disclose or suggest the features "... the brush member has a resistance value between  $1 \times 10^3 \Omega$  and  $1 \times 10^8 \Omega$  ..." as recited in amended Claim 1.

Independent Claims 13, 27 and 31 include subject matter substantially similar to what is recited in amended Claim 1 to the extent discussed above.

Accordingly, it is respectfully submitted that independent Claims 1, 13, 27 and 31, and the claims depending therefrom, patentably distinguish over Amemiya.

Kimura describes an image forming device.<sup>2</sup> However, Applicant respectfully submits that Kimura fails to disclose or suggest the features "... a brush member configured to contact and to remove negatively charged toner particles from a member ... the brush member comprises ... a fiber material that is positively chargeable when rubbed with the toner particles ..." (emphasis added in underline) as recited in amended Claim 1.

Independent Claims 13, 27 and 31 include subject matter substantially similar to what is recited in amended Claim 1 to the extent discussed above.

Accordingly, it is respectfully submitted that independent Claims 1, 13, 27 and 31, and the claims depending therefrom, patentably distinguish over Kimura.

Tombs describes a method and apparatus for adjusting charge on toner.<sup>3</sup> However, Applicant respectfully submits that Tombs fails to disclose or suggest the features "... the brush member has a resistance value between  $1 \times 10^3 \Omega$  and  $1 \times 10^8 \Omega$  ..." as recited in amended Claim 1.

Independent Claims 13, 27 and 31 include subject matter substantially similar to what is recited in amended Claim 1 to the extent discussed above.

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<sup>1</sup> See Amemiya, the abstract.

<sup>2</sup> See Kimura, the abstract.

<sup>3</sup> See Tombs, the abstract.

Accordingly, it is respectfully submitted that independent Claims 1, 13, 27 and 31, and the claims depending therefrom, patentably distinguish over Tombs.

Hiroshima describes an image forming apparatus.<sup>4</sup> However, Applicant respectfully submits that Hiroshima fails to disclose or suggest the features "... a brush member configured to contact and to remove negatively charged toner particles from a member ... the brush member comprises ... a fiber material that is positively chargeable when rubbed with the toner particles ..." (emphasis added in underline) as recited in amended Claim 1.

Independent Claims 13, 27 and 31 include subject matter substantially similar to what is recited in amended Claim 1 to the extent discussed above.

Accordingly, it is respectfully submitted that independent Claims 1, 13, 27 and 31, and the claims depending therefrom, patentably distinguish over Hiroshima.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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<sup>4</sup> See Hiroshima, the abstract.